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Attorneys for John R. Gray; Knight Transportation, Inc.

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Corey Ramon Moreland, an individual; Terri L.  
Moreland, an individual;

Plaintiffs,

vs.

John Richard Gray, an individual; Knight  
Transportation, Inc., a foreign corporation; Doe  
Owners I-V; Doe Drivers I-V; Does I-V; and Roes I-  
V, inclusive,

Defendants.

Case No.: 2:24-cv-01909

**Stipulation and Order to Extend  
Discovery [Second Request]**

**I. Summary of Discovery Completed**

The case was removed on October 14, 2024<sup>1</sup>. Both parties have served their disclosures, Plaintiffs on November 14, 2024, and Defendants on October 15, 2024. The Order Granting the Stipulated Discovery Plan and Scheduling Order was filed on November 25, 2024<sup>2</sup>. An Order Granting Stipulation to Protect Confidential Materials and Information was filed on December 11, 2024<sup>3</sup>. Defendants served written discovery on Plaintiffs October 15, 2024, and Plaintiffs responses were served December 6, 2024. Plaintiffs served discovery on Defendants December 12, 2024, and Defendants' response are due January 21, 2025. Defendants served five (5) subpoenas for insurance records and have received the responsive documents.

<sup>1</sup> ECF 1.

<sup>2</sup> ECF 10.

<sup>3</sup> ECF 13.

**II. Discovery Remaining**

Defendants are still in the process of requesting Plaintiffs' medical records and billing statements. Plaintiffs will want to depose Defendants, and Defendants will want to depose Plaintiffs. Plaintiffs are both currently scheduled to undergo major surgeries, which they allege are related to this litigation, and will require post-op recovery time prior to Defendants taking their depositions. The Parties will also need additional time to gather the surgical records and post-op care resulting therefrom, and provide said records to their respective expert witnesses. Plaintiffs may depose Defendant's FRCP 30(b)(6) witness. The parties will also need to take depositions of experts once rebuttal experts are disclosed.

**III. Why the Remaining Discovery Could not be Completed**

The current discovery deadlines could not be met because the parties both need additional time to conduct discovery on Plaintiffs prior personal injury claims and obtain records regarding treatment for said claims. Defendants also require more time to collect Plaintiffs' medical records as they received care from many providers. Plaintiffs are also scheduled to undergo surgeries and will require post-op recovery time prior to depositions being taken. The Parties will also need additional time to gather their surgical records to provide to their expert witnesses to prepare rebuttal expert reports.

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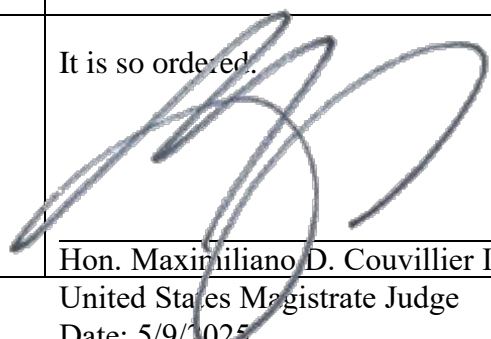
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**I. Proposed Schedule for Completing All Remaining Discovery**

	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Amending Pleadings and Adding Parties	January 13, 2025	No Change
Initial Expert Disclosures & Interim Status Report	April 11, 2025	No Change
Rebuttal Expert Disclosures	May 12, 2025	September 9, 2025
Discovery Closes	June 11, 2025	October 9, 2025
Dispositive Motions	July 11, 2025	November 10, 2025
Pre-Trial Order, if no Dispositive Motions	August 11, 2025	December 9, 2025

**IT IS SO STIPULATED:**

Dated: May 8, 2025.  <u>/s/ Michael Lowry</u> Michael P. Lowry, Esq. Nevada Bar No. 10666 Kimberly A. Nelson, Esq. Nevada Bar No. 15295 Attorneys for John R. Gray; Knight Transportation, Inc.	Dated: May 8, 2025. RALPH A. SCHWARTZ, P.C.  <u>/s/ Ralph A. Schwartz</u> Ralph A. Schwartz, Esq. Nevada Bar No. 5488 Attorneys for Corey Ramon Moreland and Terri L. Moreland
	It is so ordered.  _____ Hon. Maximiliano D. Couvillier III United States Magistrate Judge Date: 5/9/2025

The Court notes that it is unclear whether defendants responded to plaintiff's discovery as scheduled on January 21, 2025. Future stipulations should provide a more detailed description of the discovery completed, and bold the discovery completed since a prior extension.